

# Exhibit C



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Brion B. Doyle

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April 23, 2021

**Via E-mail**

Matthew E. Stubbs  
Montgomery Jonson  
600 Vine Street, Suite 2650  
Cincinnati, Ohio 45202

Re: *Whiteamire Clinic, P.A., Inc. v Cartridge World North America, LLC, et al.*  
USDC Northern District of Ohio; Civil Action No. 1:16-cv-00226  
Blackford Capital's Response to Plaintiff's Subpoena  
Cartridge World USA's Response to Plaintiff's Subpoena

Dear Mr. Stubbs:

As you know, we represent Cartridge World USA, LLC ("CW USA") and Blackford Capital ("Blackford"). Enclosed please find our clients' objections to your subpoenas.

As you are aware from our prior correspondence to you, CW USA obtained a license from Cartridge World Australia Pty Ltd ("CW Australia"), and not from Cartridge World North America, LLC ("CWNA"), the defendant in your client's lawsuit. CW USA has never had any business dealings or any other relationship with CWNA. Likewise, the license that CW USA purchased from CW Australia commenced on December 23, 2019, and CW USA had no responsibility or control over the operation of the licensed business prior to that date. Consistent with that, CW Australia is required to indemnify CW USA from all aspects of the pre-license conduct of the business.

Based on this information, which is already in your possession pursuant to the License Agreement that we provided to your office under a confidentiality agreement, there is no basis or justification for the broad categories of financial information that you have requested from our clients. The only information that could be potentially relevant to your client's judgment enforcement is CW USA's payment of \$2.6 million to CW Australia. But you already have all of the information that you need on that item from CW USA, which is confirmation that the funds were paid. CW USA has no knowledge as to the disposition of those funds after the payment was tendered under the License Agreement. To the extent that you believe CW Australia may somehow be liable on your judgment against CW USA, your proper recourse is to seek discovery against CW Australia related to those funds.

Matthew E. Stubbs

April 23, 2021

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Please do not hesitate to contact me to discuss these matters further.

Sincerely yours,

**VARNUM**

A handwritten signature in blue ink, appearing to read "Brion B. Doyle", is positioned above the printed name.

Brion B. Doyle

BBD/sm

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